

1   **6.0 OTHER REQUIRED CEQA SECTIONS**  
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3   **6.1 INTRODUCTION TO ADDITIONAL CEQA REQUIREMENTS**

4   The California Environmental Quality Act (CEQA) requires evaluations of potentially  
5   significant environmental impacts, irreversible or irretrievable commitment of resources,  
6   and Project related growth-inducing impacts. The following sections evaluate the  
7   proposed Project in light of these requirements.

8   **6.2 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT  
9   THAT CANNOT BE MITIGATED TO LESS THAN SIGNIFICANT**

10   Section 15126.2(b) of the State CEQA Guidelines requires that an Environmental  
11   Impact Report (EIR) describe any significant impacts that cannot be avoided, even with  
12   the implementation of feasible mitigation measures. Effects on environmental  
13   resources were evaluated to determine any significant unavoidable impacts. Approval  
14   of the Project would be subject to a Statement of Overriding Considerations under the  
15   CEQA due to the significant unavoidable impacts that would remain after mitigation is  
16   applied.

17   Almost all the significant, unavoidable impacts that cannot be mitigated (Class I) to a  
18   level of less than significant are the result of an accidental release of crude oil. As  
19   discussed in detail in Section 4.0, Environmental Analysis, an accidental release of  
20   crude oil would result in significant impacts to marine and onshore water quality; marine  
21   and onshore biological resources, including commercial and recreational fishing; land  
22   use and recreation; and visual resources. A number of mitigation measures were  
23   identified that would reduce the frequency and consequences of spills; however, the risk  
24   of spills to the environment would still increase over current operations and could not be  
25   completely reduced to below a level of significance.

26   **6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS OF THE  
27   PROPOSED PROJECT**

28   Section 15126.2(c) of the State CEQA Guidelines states that significant irreversible  
29   environmental changes that would be involved with a proposed Project may include the  
30   following:

- 31   • Irreversible damage to the use of non-renewable resources during the initial and  
32   continued phases of the Project; a large commitment of such resources makes  
33   removal or non-use thereafter unlikely;

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- 1     • Primary impacts and, particularly, secondary impacts which commit future  
2       generations to similar uses; and
  
- 3     • Irreversible damage resulting from environmental accidents associated with the  
4       Project.

5     The purpose of the proposed Project is to fully develop the South Ellwood Field and to  
6     transport crude oil via a new pipeline, thus allowing for the abandonment of the Ellwood  
7     Marine Terminal (EMT). Thus, the Project, by definition, involves development and  
8     production of non-renewable resources. Implementation of the proposed Project would  
9     also involve the consumption of some non-renewable and locally limited natural  
10    resources, i.e., fossil fuels associated with oil and gas processing and transport.  
11    However, the main goal of the proposed Project is to accommodate the development of  
12    non-renewable oil resources through existing infrastructure. Therefore, the demand of  
13    the proposed Project for non-renewable resources is not considered significant.

14    The proposed Project involves extending the boundary of existing oil and gas leases  
15    (State leases PRC 3120 and PRC 3242) to facilitate full development of the South  
16    Ellwood Field. There would be no construction of new facilities and only minor  
17    modifications to existing facilities. A new pipeline would be constructed to transport  
18    crude oil to a regional common carrier pipeline system and the existing marine terminal  
19    would be abandoned. The Project would increase the volume of oil being produced  
20    from the Project facilities from what is produced presently under current baseline  
21    conditions; however, the increased volumes would not exceed the volumes that are  
22    permitted for the existing facilities.

23    The proposed Project could result in oil spills that have the potential to create  
24    irreversible impacts to environmental resources. Potential impacts can be reduced  
25    through the use of adequate design and operating procedures, effective emergency  
26    response plans specifying staffing and equipment needs and implementation of the  
27    mitigation measures identified in this document. However, the potential remains for  
28    significant impacts as a result of an oil spill associated with the proposed Project.

29    The proposed Project would also emit greenhouse gases (GHG) which could potentially  
30    contribute to climate change. While the project would only contribute a minor increase in  
31    oil production and consumption, it would continue the trend of reliance on non-  
32    renewable fossil fuel consumption with the project's contribution to associated local and  
33    larger scale environmental impacts such as global warming as discussed in Air Quality  
34    (Section 4.3).

1   **6.4 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT**

2   Section 15126.2(d) of the State CEQA Guidelines states that growth-inducing impacts  
3   of the proposed Project must be discussed in the EIR. In general terms, a project may  
4   induce spatial, economic, or population growth in a geographic area if it meets any one  
5   of the four criteria identified below:

- 6         • Removal of an impediment to growth, e.g., establishment of an essential public  
7             service or the provisions of new access to an area; or
- 8         • Economic expansion or growth, e.g., changes in revenue base or employment  
9             expansion; or
- 10         • Establishment of a precedent-setting action, e.g., an innovation, a change in  
11             zoning, or general plan amendment approval; or
- 12         • Development or encroachment in an isolated area or one adjacent to open space  
13             (being different from an “infill” type of project).

14   Should a project meet any one of the criteria listed above, it can be considered growth  
15   inducing. The impacts of the proposed Project are evaluated below with regard to these  
16   four growth-inducing criteria.

17   The proposed Project involves extending the boundary of existing oil & gas leases  
18   (State leases PRC 3120 and PRC 3242) to facilitate full development of the South  
19   Ellwood Field. There would be no construction of new facilities and only minor  
20   modifications to existing facilities. A new pipeline would be constructed to transport  
21   crude oil to a regional common carrier pipeline system and the existing marine terminal  
22   would be abandoned. The Project would increase the volume of oil being produced  
23   from the Project facilities from what is occurring under current baseline conditions;  
24   however, the increased volumes would not exceed the volumes permitted for the  
25   existing facilities.

26   The proposed Project would not remove an impediment to growth or result in the  
27   establishment of an essential public service, and it would not provide new access to an  
28   area previously inaccessible.

29   The Project would not result in increased employment in the area other than short term  
30   construction jobs. No increase in personnel is proposed as part of the Project. The  
31   operational activities would result in an increase in the revenue base for the State of

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- 1 California and the county of Santa Barbara via oil and gas royalties sharing. However,  
2 economic growth associated with the Project is not considered to be significant.
- 3 The Project would not establish a precedent-setting action such as a change in zoning  
4 or an innovation. Nor would the Project develop or encroach in an isolated area or one  
5 adjacent to open space. All Project-related facilities were constructed between 1929  
6 and 1967, and are considered 'legal non-conforming'. Development of open space is  
7 considered growth-inducing where it encroaches upon an urban-rural interface or  
8 occurs in isolated localities. All surface project activities would be limited to the existing  
9 developed facilities, with the exception of a proposed crude oil connecting pipeline,  
10 which would be constructed mostly along public right-of-way and across some private  
11 agricultural land. Accordingly, the Project is not considered to be a growth-inducing  
12 endeavor.